



STATE OF MONTANA
Department of Administration
INFORMATION TECHNOLOGY SERVICES DIVISION



Brian Schweitzer
Governor

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Comments filed on behalf of the
State of Montana

PS Docket No. 07-114

Currently there are only 7 of 57 PSAPs that have deployed Phase II Wireless E9-1-1. Much of Montana is served by Tier III Carriers (non-nationwide CMRS providers with no more than 500,000 subscribers). The Commission has recognized that small carriers face "extraordinary circumstances" in meeting deployment requirements.

The State of Montana faces similar challenges because of the rural nature of our state with a little over 900,000 population. The State of Montana recently passed legislation creating wireless cost recovery. New requirements imposed by the Commission could have the unintended consequence of causing Phase II delivery of service to halt in Montana because of financial constraints. The fiscal impacts may range from minor adjustments to the budget to major additions that far exceed the capability of current funding methodologies.

If the Commission adopts Phase II accuracy testing requirements that currently available location technologies cannot meet (such as a requirement for PSAP level testing), states like Montana with carrier cost recovery will be responsible for the cost of new technologies that have not yet been developed to meet those requirements. Obviously, since we have no way to project the cost of such new technologies, we cannot plan or budget for these costs. E-911 programs need to understand and assess the fiscal impact of any new location technologies before the decision is made to implement them.

The State of Montana supports the Ex Parte Comments filed by the National Association of State 9-1-1 Administrators (NASNA) in CC Docket No. 94-102 filed on May 23, 2007. NASNA recommends the Commission accept Phase II as it is, test it to the NRIC VII 1A report recommendation and create a new phase (call it Phase III) that identifies the public safety need for accuracy and develops a plan to achieve that goal.

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